

Goldberg, Jeffrey

From: Goldberg, Jeffrey
Sent: Monday, April 04, 2011 6:04 PM
To: 'tseg@gtlaw.com'; 'slarson@girardikeese.com'; 'mbusino@crowell.com';
'godwint@gtlaw.com'; 'mweber@girardikeese.com'; 'mhayes@helpcounsel.com';
'mkowsari@girardikeese.com'; 'jlevine@crowell.com'; 'handzlik@gtlaw.com'
Cc: Mrazek, Nicola; Miller, Douglas M. (USACAC)
Subject: United States v. Noriega, et al., 10-CR-1031 (AHM)
Attachments: 2011-04-04 USA letter to defense re joint estimate form.pdf

JUDGE A. HOWARD MATZ

JOINT TRIAL WITNESS TIME ESTIMATE FORM

CASE: U.S. v. Noriega, et al.

TRIAL DATE: April 5, 2011

	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
1	ABARCA, ERICA	GOVERNMENT (.15)		CURRENT GLOBAL EMPLOYEE (GRUPO ACCOUNT)	
2	BASURTO, SR. FERNANDO GONZALEZ	(1.0)		COOPERATING WITNESS	
3	BASURTO, JR. FERNANDO MAYA	(2.0)		COOPERATING WITNESS	IN CUSTODY
4	BATES, JANE ELLEN	(2.5)		CURRENT GLOBAL EMPLOYEE (GRUPO ACCOUNT)	
5	BERMAN, SHARON	(.50)		FERRARI OF BEVERLY HILLS	
6	BINDER, FARRELL	(1.0)		FBI AGENT (CASE AGENT)	
7	BOUTARASY, KARYN	(.5)		CURRENT LMC EMPLOYEE	
8	BROWN, MINETTE	(.5)		CURRENT LMC EMPLOYEE	
9	BUSTANI, EDUARDO	(2.0)		FORMER GLOBAL EMPLOYEE (GRUPO ACCOUNT)	
10	CEDAN SAANEDZA, ALMA PATRICIA	(1.5)		ANGELA AGUILAR'S NEIGHBOR (MEXICO)	NEEDS SPANISH INTERPRETER
	TOTAL ESTIMATES THIS PAGE:	17.25			

Instructions:

(1) List witnesses (last name first); (2) For description, be extremely brief, e.g., "eyewitness to accident." Or "expert on standard of care." (3) Use estimates within fractions of an hour, rounded off to closest quarter of an hour. E.g., if you estimate 20 minutes, make it .25. An estimate of one and one-half hours would be 1.5. An estimate of three-quarters of an hour would be .75; (4) Note special factors in "Comments" column. E.g., "Needs interpreter." (5) Entries may be in handwriting if very neat and legible.

JUDGE A. HOWARD MATZ

JOINT TRIAL WITNESS TIME ESTIMATE FORM

CASE: U.S. v. Noriega, et al.

TRIAL DATE: April 5, 2011

	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
1	CIRIACIANO, RALPH	GOVERNMENT (1.0)		FORMER UMC EMPLOYEE	
2	CORTEZ, SERGIO	(1.75)		CURRENT UMC EMPLOYEE	
3	COSTLEY, DANE	(3.0)		FBI AGENT (SUMMARY WITNESS)	
4	DE GHETTO, MICHAEL	(1.0)		FORMER UMC EMPLOYEE	
5	DELGADO, CONCEPCION	(.75)		ANGELA AGUILAR'S FRIEND	NEEDS SPANISH INTERPRETER
6	DODSON, CHRISTOPHER	(.5)		FBI AGENT (INTERVIEWED STEVE LEE)	
7	ERICKSON, PAUL	(.75)		CURRENT UMC EMPLOYEE	
8	GARZA, LAURA	(1.0)		CURRENT GLOBAL EMPLOYEE (GRUPO ACCOUNT)	
9	GOODMAN, ROBIN	(.75)		SOUTH SHORE YACHT SALES	
10	HARVIN, ANDREW	(.5)		ATTORNEY FOR GLOBAL (GRUPO ACCOUNT)	
	TOTAL ESTIMATES THIS PAGE:	11.0			

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CASE: U.S. v. Noriega, et al.

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	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
1	KILLEBREW, BRUCE	GOVERNMENT (.75)		SOUTH SHORE YACHT SALES	
2	KUNOK, CONNIE	(.5)		FORMER UMC EMPLOYEE	
3	KUNOK, MANG HUE	(1.0)		CURRENT UMC EMPLOYEE	
4	LAMARCHE, JEAN-GUY	(4.0)		ENRIQUE AGUILAR'S FORMER EMPLOYEE	NEEDS FRENCH INTERPRETER
5	MORENO, GENOVEVA	(.5)		BATA HORIZON LLC (YACHT)	
6	MORENO, JEMA	(.5)		CESAR MORENO'S DAUGHTER	
7	MORENO, ROBERT	(.5)		INSURANCE AGENT (FERRARI)	
8	PALMER, JAIME	(.75)		CURRENT BUUFFVIEW EMPLOYEE (GIBURO ACCOUNT)	
9	SEPOCK, RICHARD	(1.0)		FORMER UMC EMPLOYEE	
10	SPILLANE, PHILIP	(.75)		CURRENT UMC EMPLOYEE	
	TOTAL ESTIMATES THIS PAGE:	10.25			

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JUDGE A. HOWARD MATZ

JOINT TRIAL WITNESS TIME ESTIMATE FORM

CASE: U.S. v. Noriega, et al.

TRIAL DATE: April 5, 2011

	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
1	VARCO, SUZANNE	GOVERNMENT (0.5)		NESTOR MORENO'S NEIGHBOR (SAN DIEGO)	
2	WILUETT, BRIAN	(1.0)		FBI AGENT (INTERVIEWED STEVE LEE)	
3	ZANALETA, JOSE	(2.0)		FORMER LMC EMPLOYEE	
4	WALDRUP, TANDRA	(1.5)		FBI AGENT (PUBLICATION WITNESS)	
5					
6					
7					
8					
9					
10					
	TOTAL ESTIMATES THIS PAGE:			6.0	

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Goldberg, Jeffrey

From: Levine, Janet [JLevine@crowell.com]
Sent: Monday, April 04, 2011 6:46 PM
To: Stephen Larson; Goldberg, Jeffrey; tseg@gtlaw.com; Busino, Martinique; godwint@gtlaw.com; Molly Weber; mhayes@helpcounsel.com; Michael Kowsari; handzlikj@gtlaw.com
Cc: Mrazek, Nicola; Miller, Douglas M. (USACAC)
Subject: RE: United States v. Noriega, et al., 10-CR-1031 (AHM)

I agree with Stephen.

From: Stephen Larson [mailto:slarson@qirardikeese.com]
Sent: Monday, April 04, 2011 3:42 PM
To: 'Goldberg, Jeffrey'; tseg@gtlaw.com; Busino, Martinique; godwint@gtlaw.com; Molly Weber; mhayes@helpcounsel.com; Michael Kowsari; Levine, Janet; handzlikj@gtlaw.com
Cc: Mrazek, Nicola; Miller, Douglas M. (USACAC)
Subject: RE: United States v. Noriega, et al., 10-CR-1031 (AHM)

I will take this up with the Court in the morning; my concern is that disclosing in advance my cross examination estimates will reveal certain defense case strategy that I am not prepared to disclose at this time.

Best, Stephen

From: Goldberg, Jeffrey [mailto:Jeffrey.Goldberg2@usdoj.gov]
Sent: Monday, April 04, 2011 3:04 PM
To: tseg@gtlaw.com; Stephen Larson; mbusino@crowell.com; godwint@gtlaw.com; Molly Weber; mhayes@helpcounsel.com; Michael Kowsari; jlevine@crowell.com; handzlikj@gtlaw.com
Cc: Mrazek, Nicola; Miller, Douglas M. (USACAC)
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